EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

CASE NO. 2:24-CV-00093-JRG-RSP

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VIRTAMOVE, CORP.,

Plaintiff,

vs.

HEWLETT PACKARD ENTERPRISE COMPANY,

Defendant.

_____

CASE NO. 2:24-CV-00064-JRG-RSP

VIRTAMOVE, CORP.,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES CORP.,

Defendant.

_____

VIDEOTAPED / REALTIMED DEPOSITION OF

DR. ANGELOS STAVROU

(Conducted Remotely)

FRIDAY, FEBRUARY 7, 2025

9:03 a.m. CST

_____

Reported by: Pat English-Arredondo, CSR, RMR, CRR

Job No. 10232

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 1                    A P P E A R A N C E S

 2                 (All appearing remotely)

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 1                      EXAMINATION INDEX

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 1                          EXHIBITS

 2    NO.                     DESCRIPTION              PAGE

 3    STAVROU EXHIBIT NO. 1                            7
      Declaration of Angelos Stavrou Regarding
 4    the IBM Counterclaim Patents and
      VirtaMove '058 patent, 92 pages
 5
      STAVROU EXHIBIT NO. 2                            7
 6    Angelos Stavrou declaration regarding
      VirtaMove '058 patent, 173 pages
 7
      STAVROU EXHIBIT NO. 3                            11
 8    US Patent No. 8,943,500 dated 1-27-15,
      19 pages
 9

10

11      (REPORTER'S NOTE: All quotations from exhibits are

12    reflected in the manner in which they were read into

13    the record and do not necessarily denote an exact

14    quote from the document.)

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 1              (Following commenced at 9:02 a.m.)

 2                   THE VIDEOGRAPHER:  We are on the

 3   record on February 7, 2025, at approximately

 4   9:03 a.m. Central time for the remote video

 5   deposition of Dr. Angelos Stavrou in the matter of

 6   VirtaMove Corp. versus Hewlett Packard Enterprise

 7   Company.

 8                   My name is Betsy Gomez, and I am the

 9   videographer on behalf of TransPerfect Legal

10   Solutions.

11                   Will counsel please introduce

12   themselves and the party they represent, beginning

13   with the party noticing this proceeding.

14                   MR. MILKEY:  This is James Milkey

15   with the law firm of Russ, August & Kabat.  I'm

16   representing plaintiff, VirtaMove.

17                   MR. NGEREBARA:  This is Nathan

18   Ngerebara with the law firm of Kirkland & Ellis on

19   behalf of IBM.

20                   MR. KASSA:  This is Sam Kassa from

21   Baker Botts on behalf of Hewlett Packard Enterprise.

22                   THE VIDEOGRAPHER:  Anyone else?

23                   (No response.)

24                   THE VIDEOGRAPHER:  Will the court

25   reporter please swear in the witness.
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 1                    THE REPORTER:  Sir, will you go ahead

 2   and raise your right hand to be administered the

 3   oath?

 4                    ANGELOS STAVROU,

 5   being called as a witness, and having been duly

 6   sworn, testified as follows:

 7                    THE WITNESS:  Yes.

 8                    THE REPORTER:  Thank you, sir.

 9                         EXAMINATION

10   BY MR. MILKEY:

11        Q.    Good morning, Dr. Stavrou.

12        A.    Good morning.

13        Q.    Could you please state your full name for

14   the record?

15        A.    Yes.  My full name is Angelos Stavrou.

16        Q.    Thank you.

17              And you're here to testify today as an

18   expert on behalf of IBM and Hewlett Packard.  Right?

19        A.    That is correct.

20        Q.    Do you -- so you've offered two different

21   declarations regarding VirtaMove.  Correct?

22        A.    That is correct.

23        Q.    Okay.  Do you have copies of those

24   declarations available?

25        A.    I have physical copies.  If you want to
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 1   introduce digital copies, I would be happy to take

 2   them.

 3   Q.   Yeah, so you're free to use physical

 4   copies of your declarations. I'm going to -- I'm

 5   going to introduce as Exhibit 1 your declaration

 6   regarding the IBM counterclaim patents and Exhibit 2

 7   as your declaration regarding the VirtaMove '058

 8   patent.

 9   (Marked was Stavrou Exhibit No. 1.)

10   (Marked was Stavrou Exhibit No. 2.)

11   Q.   (By Mr. Milkey) And like I said, feel

12   free to either use these digital copies or any

13   physical copy that you have. Either is fine.

14   A.   Thank you. Give me a few seconds to

15   download them to make sure that I can open them.

16   Yes, I'm able to open them. Thank you.

17   Q.   Thank you.

18   So before we begin, did you do anything

19   to prepare for today's deposition?

20   A.   I did.

21   Q.   What did you do to prepare for today's

22   deposition?

23   A.   I read my declarations and also I met

24   with the counsel from Kirkland & Ellis and

25   Baker Botts.

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 1          Q.    Okay.  Did you meet with anyone else in

 2   preparation for today's deposition?

 3          A.    Not beyond the lawyers from Kirkland &

 4   Ellis and Baker Botts.

 5          Q.    Okay.  And approximately how long did you

 6   spend preparing for today's deposition?

 7          A.    I was here the past few -- past two days.

 8   We didn't work the entire day.  And, you know, I

 9   would say two days but, you know, not the entire

10   time.  Let's put it this way.

11          Q.    Okay.  And how long did you spend in

12   forming your opinions set forth in your declarations

13   in these proceedings?

14          A.    Oh, we spent months because this -- I

15   think -- I believe this started sometimes middle of

16   last year where I got involved in reading the

17   patents and going through the claims and the

18   specification of the patents.

19                So I would say it's been a few months

20   now.

21          Q.    Okay.  Do you have an estimate of how

22   many hours you've spent over those few months?

23          A.    I would not be precise, but I spent some

24   time on each of the patents.  So I cannot give you

25   an exact estimate.  I would have to look at my
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 1   records, and I don't have them in front of me.

 2   Q.   Okay. Understood.

 3   So if we could look at your declaration

 4   regarding the IBM counterclaim patents. And this is

 5   Exhibit 1.

 6   A.   Yes.

 7   Q.   And turning to Page 20, which is the

 8   first claim term, which is (as read): "A system ...

 9   created during installation ... removed as part of

10   an uninstall."

11   Do you see that?

12   A.   Just give me a second. I'm trying to

13   navigate there. Yes.

14   Q.   Okay. And then going to Paragraph 49 on

15   Page 21, you state in that paragraph that (as read):

16   "The claim language itself provides clarity to a

17   POSITA indicating that 'the one or more isolated

18   environments are created during installation of the

19   one or more applications' and that, 'the one or more

20   isolated environments are copied to storage and then

21   removed as part of an uninstall of the one or more

22   applications.'"

23   Do you see that?

24   A.   Yes, that's correct.

25   Q.   Okay. So you agree that in order to

Page 10

 1 practice this limitation, the one or more isolated

 2 environments must be created during installation of

 3 the one or more applications. Correct?

 4   MR. NGEREBARA: Objection, form.

 5   A.   Can you please repeat the question just

 6 to make sure that I have it correctly?

 7   Q.   (By Mr. Milkey) Yeah. So in order to

 8 practice the limitation that you're discussing in

 9 this section of your report starting on

10 Paragraph 46, you agree that the one or more

11 isolated environments must be created during

12 installation of the one or more applications.

13 Correct?

14   MR. NGEREBARA: Objection, form.

15   A.   That is correct.

16   Q.   (By Mr. Milkey) Then turning to Page 24

17 of your declaration, Exhibit 1, do you see this is

18 where you address the claim term, "the system

19 resources"?

20   A.   That's correct.

21   Q.   Okay. And so my question is -- and,

22 sorry, before I get into this, do you have a copy of

23 the '500 patent?

24   A.   I don't have one. If you can introduce

25 the exhibit, I would be able to open it.

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 1        Q.     Yeah, I will provide that.

 2              And so this is introduced as Exhibit 3

 3  the, US Patent No. 8,943,500.  And, Dr. Stavrou, is

 4  it okay if we refer to this as the '500 patent?

 5        A.     Sure.

 6              (Marked was Stavrou Exhibit No. 3.)

 7        Q.     (By Mr. Milkey)  If you could open up

 8  Exhibit 3, the '500 patent, and go to the very last

 9  page of it, there is Claim 19.  Just let me know

10  when you're there.

11        A.     50?

12        Q.     Correct?

13        A.     50?

14        Q.     Correct, yeah.  Column 14, Line 50.

15        A.     Okay.

16        Q.     And so you see in Claim 19 it refers to

17  "the system resources."

18              And so my question is, what provides

19  antecedent basis for the term "the system resources"

20  in Claim 19?

21        A.     So as we see here, this is a dependent

22  claim and it depends on Claim 18.

23              In Claim 18, I believe -- let me

24  check -- the word "additional resources" is included

25  as part of Claim 18, which is on the same -- on 14,
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 1   I believe, 39.

 2   And a person of ordinary skill in the art

 3   would have understood that basically the system

 4   resources that are referred to in Claim 19 are

 5   connected to the additional resources that are

 6   mentioned in Claim 18.

 7   THE REPORTER: Excuse me, Doctor.

 8   Did you say "are" or "aren't"?

 9   THE WITNESS: They are. I apologize.

10   They are.

11   Q.   (By Mr. Milkey) Okay. So your opinion

12   is that these system resources of Claim 19 refers to

13   the additional resources that Claim 18 recites. Is

14   that correct?

15   A.   My opinion is that the patent recites

16   maintain mapping between the system resource and

17   out -- inside and outside the one or more isolated

18   environments in outside.

19   The system resources -- first (as read):

20   "the system resources inside the one or more

21   isolated environments and outside the -- is the

22   isolated environment," as recited in the claims.

23   So that here, to realize is that the

24   additional resources does not require an exhaustive

25   list of full system resources, other resources

Page 13

1   basically specifically mentioned by the claims,

2   which is basically explicit.

3   Also, if you want me to elucidate, I'm

4   happy to go on. You let me know.

5   Q.   Yeah, I'm not quite sure I understand.

6   You previously testified, I thought, that the system

7   resources of Claim 19 was related to the additional

8   resources of Claim 18?

9   A.   I don't think that's correct. What I

10   said is -- again, and I will repeat it just to be on

11   the same.

12   Resources basically -- the term "system

13   resources inside and outside the one or more

14   isolated environments" indicates to a POSITA that

15   claims contemplate any system resources that would

16   satisfy the requirements of Claims 19 and -- 18 and

17   19, rather than requiring an exhaustive list of all

18   system resources.

19   So I want to clarify here that I didn't

20   mean an exhaustive list of all system resources but

21   specifically what I just mentioned.

22   Q.   Okay. So when Claim 19 recites "the

23   system resources inside the one or more isolated

24   environments," does that mean the same thing as any

25   system resources inside the one or more isolated

Page 14

 1   environments?

 2   MR. NGEREBARA: Objection, form.

 3   A.   I believe that I just mentioned that we

 4   want to -- the term refers to both -- to system

 5   resources inside the one or more isolated

 6   environments and so -- and outside.

 7   So it is -- it is important to maintain a

 8   mapping between the system resource inside the one

 9   or more isolated environments and outside.

10   So here, again, the patent specifications

11   confirm my understanding that the specification

12   provides examples of system resources, memories,

13   storage, and CPUs. CPUs that can be mapped from

14   outside to inside.

15   Q.   (By Mr. Milkey) Okay. But it doesn't

16   have to be all of those system resources inside and

17   outside that have to be mapped. Correct?

18   A.   Are you referring to -- I apologize. Can

19   you please clarify?

20   Do you refer to the system resources

21   inside or outside, so I can answer the question?

22   Q.   I'm referring to both. So just backing

23   up a second.

24   The claim requires instructions for

25   maintaining mapping between the system resources

 1   inside the one or more isolated environments and

 2   outside.

 3   So that we're on the same page, do you

 4   understand this to require a mapping between system

 5   resources inside the one or more isolated

 6   environments, on the one hand, and

 7   outside -- sorry -- and system resources outside the

 8   system -- let me reask that.

 9   Do you understand Claim 19 to require

10   instructions for maintaining mapping between, on the

11   one hand, system resources inside the one or more

12   isolated environments and, on the other hand, system

13   resources outside the one or more isolated

14   environments?

15   A.   I think the argument here is reversed.

16   You need to be able to map resources outside of the

17   isolated environment to resources inside the

18   isolated environment because the outside has usually

19   more resources.

20   And it's allocating -- in this case not

21   allocating but mapping these resources inside the

22   isolated environments. So here the key component is

23   that the additional resources that are mentioned in

24   Claim 18 are further elucidated in Claim 19 by

25   basically mapping between the system resources

Page 16

 1   inside the one or more isolated environment and

 2   outside.

 3   So of course here you can -- the

 4   mapping -- the mapping is reciprocal, so it doesn't

 5   matter if you talk about inside or outside.

 6   THE REPORTER: Excuse me, Doctor.

 7   You're going to have to slow down.

 8   THE WITNESS: I'm sorry about that.

 9   A.   The mapping has two elements, so it

10   doesn't matter if you recite the first element,

11   which is inside in this case, to the outside.

12   So either you sit inside

13   mapping -- it's -- in reality the mapping refers to

14   resources on two ends. So it doesn't matter if you

15   start from the inside or the outside.

16   Q.   (By Mr. Milkey) Okay. Understood.

17   A.   I just want to be very clear. It's not

18   resources on the inside necessarily that map to the

19   outside. It can also be the reverse.

20   Q.   Correct. That makes sense.

21   So my question, then, is: The claim does

22   not require, in your opinion, instructions for

23   maintaining mapping between all of the system

24   resources inside the one or more isolated

25   environments and all of the system resources outside

1   the one or more isolated environments. Correct?

2   MR. NGEREBARA: Objection, form.

3   A.   As I read it, it does not make a

4   specification either way.

5   Q.   (By Mr. Milkey) Okay. In your opinion,

6   does the claim require instructions for maintaining

7   mapping between just some of the system resources

8   inside the one or more isolated environments and

9   some of the system resources outside the one or more

10   isolated environments?

11   MR. NGEREBARA: Objection, form.

12   A.   The way that I personally read it is that

13   there are resources, system resources, that are

14   being mapped. It's a generic term.

15   Now, I don't know if it's going to be all

16   the resources inside with all the resources outside

17   or if it's going to be some of the resources inside;

18   but the claim, as it's written, it's not restrictive

19   in that sense.

20   But at the same time, again, there are

21   finite resources, system resources; and the examples

22   that I provided of system resources that include

23   memory, storage, and CPUs, are very traditional

24   system resources that are being used to create these

25   isolated environments.

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 1   Now, I don't know if there are

 2   potentially -- the examples are not restrictive, so

 3   maybe there are other resources that also can be

 4   mapped.

 5   But it's -- I would have understood it in

 6   the plain and ordinary meaning of the system

 7   resources, which is just a straightforward term that

 8   does not require any -- any further, you know,

 9   elucidation. Let's put it this way.

10   Q.   (By Mr. Milkey) Okay. So for Claim 19,

11   for the limitation of Claim 19, is that satisfied if

12   there are instructions for maintaining mapping

13   between at least some system resources inside the

14   one or more isolated environments and at least some

15   system resources outside of the one or more isolated

16   environments?

17   MR. NGEREBARA: Objection, form.

18   A.   Again, the specific claim does not

19   mention any of that in the sense that it does

20   not -- it doesn't limit itself. It can be all or it

21   can be some. I don't see a way that restricts

22   itself to -- you know, there is no qualifier here.

23   But, as I said, it's very obvious to me,

24   based on the spec, that the resources are

25   quantifiable term in our field.

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 1              And basically the mapping -- it basically

 2    talks about mapping, which is actually -- as I said,

 3    it is tied clearly to the fact that in Claim 18

 4    there is the need of additional resources.

 5              So these resources, these additional

 6    resources are being provided by Claim 19 where, you

 7    know, it talks about a mapping between a system

 8    resources inside the one or more isolated

 9    environments and outside.

10        Q.    (By Mr. Milkey)  Okay.  And if you could

11    turn to Page 27 of Exhibit 1.

12        A.    Give me just one second.  I'm there.

13        Q.    And you see this is where you begin

14    analyzing "appropriate for infrastructure

15    configuration mapping."  Correct?

16        A.    That's correct.

17        Q.    Okay.  Okay.  And I want to turn to -- on

18    the next page in Paragraph 69, toward the bottom of

19    that paragraph you have a sentence that states (as

20    read):  "Similarly, whether there is a conflict

21    between source and cloud infrastructure is an

22    objective analysis for the POSITA."

23              Do you see that?

24        A.    Correct.

25        Q.    Okay.  How would a POSITA perform the
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 1   objective analysis of whether there is a conflict

 2   between source and cloud infrastructure?

 3        A.    In the spec of the patent there are

 4   examples that basically -- that show, for instance,

 5   that there might be configuration, infrastructure

 6   configuration conflicts.

 7             Sometimes also -- yes.  So, to me, when

 8   you have two infrastructures that you want to use,

 9   there might be conflicts between them.  And there

10   is a process --

11        Q.    And --

12        A.    I'm sorry.  Go ahead.  Apologize.

13        Q.    Yeah.  Sorry.

14             But -- so understood that there might be

15   conflicts between two infrastructure configurations.

16             My question specifically is:  How would a

17   POSITA determine whether there is a conflict between

18   two infrastructure configurations?

19        A.    So, for instance, in the '858

20   specification there is discussion that is not

21   limiting that shows that HP event filters are

22   associated with products from Hewlett Packard,

23   Palo Alto, can be used in the source environment and

24   how they can be mapped to IBM  Tivoli monitoring

25   environment which is event filters?
```

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 1   So, in other words, the examples are

 2   very spec- -- very clearly specified, a process that

 3   you would follow. It's not limiting in any form or

 4   fashion because, basically, it gives specific

 5   examples to elucidate what the claims talk about.

 6   Q.   Okay. So you mentioned determining

 7   whether there is a conflict between two

 8   infrastructure configurations as an example of this

 9   limitation.

10   Can you give me one example of how a

11   POSITA would determine whether there is a conflict

12   between two infrastructure configurations?

13   A.   You want me to give you or do you want to

14   use examples from the spec?

15   Because, for example, in my mind one

16   option would be to see if there is enough storage,

17   for instance, between the two -- again, this is not

18   a limiting -- a limiting example. But there are

19   resource conflicts that can potentially arise.

20   I mean, and this is my personal opinion.

21   Again, the claims and the spec.

22   Another option would be, for example, to

23   use discover sourcing for such logs. Again, in the

24   patent it's under '858, Column 32 -- 36 --

25   Column 32, Lines 33 through 36.

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 1               So it is very common for us -- for people

 2    that basically perform source to -- let's call it

 3    for lack of -- I mean, to destination, the

 4    transformation, to take a look at the -- to create

 5    mapping, infrastructure configuration mapping from

 6    this -- from an origin to a target, from a source to

 7    a target.

 8         Q.    Okay.

 9         A.    And, by the way, there are cloud

10    infrastructure configuration standards that can be

11    used here, too.  So it's not -- it's not an

12    arbitrary process.

13         Q.    Okay.  So there are different ways to

14    determine conflicts between infrastructure

15    configurations?

16         A.    Let me ask a clarification.  When you

17    say -- so infrastructure conflicts exist.  The way

18    that you can discover them, you might take different

19    paths.  Some of these paths might be completely

20    identical in the results.

21         Q.    You said some of these paths might be

22    completely identical in the results.  Are all the

23    paths completely identical in the results?

24         A.    So the answer to that question, it is yes

25    if you use the proper standard and you perform the
```

 1   process properly.

 2   Of course, I mean, if you use the wrong

 3   tools or you -- you know, you have to -- that's the

 4   reason that the patent basically provides not only

 5   examples but basically -- it talks about the

 6   discovery process of the sourcing infrastructure,

 7   how it's being mapped.

 8   There is a lot of detail because that's

 9   important to be able to create consistent and

10   conflict-free mappings.

11   In other words, the devil can be in the

12   details in the sense that there are many different

13   ways that information can be used. But in this

14   specific patent it's pretty clear for a POSITA how

15   this information is going to be used.

16   Q.   Okay. If you could go to Page 38 of

17   Exhibit 1.

18   A.   I'm there.

19   Q.   You see this is the section -- the very

20   bottom of Page 38 is the section that addresses the

21   "non-functional requirement" limitation.

22   Do you see that?

23   A.   The non-functional requirement, yes, sir.

24   Q.   Okay. And I want to ask about

25   Paragraph 94 of your declaration in particular. And

Page 24

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 1   this is -- it begins on Page 40.

 2        A.    Yes.  I'm there.

 3        Q.    And on Paragraph 94, about halfway down,

 4   you have a sentence that says:  "Thus, the patent

 5   clearly provides examples illustrating the meaning

 6   of 'non-functional requirements' in some

 7   exemplary -- in some exemplary embodiments,

 8   including the 'SLAs' - service level agreement - can

 9   be non-functional requirements."

10             Do you see that?

11        A.    Yes.

12        Q.    So you say here that (as read):  "SLAs

13   can be nonfunctional requirements."

14             My question is:  Are SLAs non-functional

15   requirements?

16        A.    Well, SLAs have -- SLAs can be -- is an

17   example, is provided as an example here of

18   non-functional requirement.

19             Within the SLA, the SLA can have

20   non-functional requirement portions, but also it can

21   have functional requirement portions based on the

22   way it's specified.

23             So in general SLA can have both.  In this

24   case, it's being used as an example for the portion

25   of SLA that can be used for non-functional
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 1   requirements.

 2   Q.   And then if you could go to Page 42 of

 3   your declaration, Exhibit 1. You see this is

 4   Section V addressing the "module" limitation?

 5   A.   Yes.

 6   Q.   What is a software module?

 7   A.   So a software module has to be -- it has

 8   to be provided in context.

 9   And in this case, a module is -- the

10   specification provides corresponding structure for

11   the term "module."

12   For example, has -- I mean, in my opinion

13   a module is a very well-defined term and has, in

14   this specific case, a sufficient definite structure

15   to be able to go with.

16   Like, I mean, you can go to the claims.

17   But in the claims, the module, it talks about (as

18   read): "distinct software module that comprised

19   discovery tool module, a description module, and an

20   infrastructure comparison and engine module."

21   So the module is not considered in vacuum

22   only. It's been given a meaning. And that is

23   actually in Claim 18.

24   Q.   Okay. That's helpful. So in Claim 18

25   you mentioned a discovery tool module. What is a

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 1   discovery tool module?

 2   A.   A discovery tool module is described as

 3   being basically -- "having a source management

 4   infrastructure, at least one source infrastructure

 5   management component, wherein said at least one

 6   source infrastructure management component is an

 7   instance of an image and wherein said at least one

 8   source infrastructure management

 9   component is running in a" --

10   (Brief off-the-record discussion.)

11   A.   As I was saying and I will repeat,

12   "discovering, in a source computing system having a

13   source management infrastructure, at least one

14   source infrastructure management component, wherein

15   said at least one source infrastructure management

16   component is an instance of an image, and wherein

17   said at least one source infrastructure management

18   component is running in a customer environment."

19   Q.   Okay. So is that the definition of a

20   discovery tool module?

21   A.   I believe that is what is basically --

22   it's highlighted in the claim, I think, which is

23   dependent on Claim 1.

24   Q.   And what is a description module?

25   A.   So (as read): "The 'description module'

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 1   conducts 'querying a database to obtain a

 2   description of a target cloud infrastructure' in the

 3   manner specified in Claim 1 using the components

 4   (for example, a database) again, recited in

 5   Claim 1."

 6   And let me also add (as read): "The

 7   'discovery tool module' conducts 'discovering in a

 8   source computing system... 'in the manner again

 9   specified in Claim 1 using the components ('source

10   computing system having a source management

11   infrastructure, at least one source infrastructure

12   management component') as recited in Claim 1."

13   Q.   Okay. And what is an infrastructure

14   comparison engine module?

15   A.   "The 'infrastructure comparison engine

16   module' conducts the 'analysis of said at least one

17   source infrastructure management component using

18   said description of said target cloud

19   infrastructure...' in the manner specified in

20   Claim 1 using the components ('at least one

21   source') -- (for example, 'at least one source

22   infrastructure management component')."

23   Q.   Turning back to Page 24 of your

24   declaration, Exhibit 1.

25   A.   Just give me a second.

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```
 1              21?

 2       Q.     24.

 3       A.     I'm there.

 4       Q.     Okay.  And, again, just to reorient

 5  ourselves, this is addressing the system resources

 6  limitation of Claim 19 of the '500 and '038 patents.

 7  Correct?

 8       A.     At the bottom of Page 24, that's correct.

 9       Q.     So on Paragraph 59 on Page 25, the last

10  sentence of Paragraph 59 says, "A POSITA would

11  understand that the term 'the system resources' can

12  refer to different sets of resources depending on

13  the specific context..."

14              Do you see that?

15       A.     I do.

16       Q.     Doesn't the fact that this term might

17  refer to different things depending on the specific

18  context make it indefinite?

19              MR. NGEREBARA:  Objection, form.

20       A.     Again, I want to be clear here that it

21  is -- my sentence continues.  It says, "...including

22  only the relevant resources associated with the

23  operation described in the claim as executed in the

24  particular environments."

25              It is very clear what "the system
```

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 1   resources" refer to. And the fact that they are

 2   different set of resources, it means that basically

 3   you might -- you're allowed to create mapping

 4   between different sets of resources, all of which

 5   are very well-defined.

 6   But you don't have to use the same set of

 7   resources every time you perform the mapping. You

 8   can use one or more resources, set of resources; and

 9   that's exactly what my sentence says here.

10   Q.   (By Mr. Milkey) So it's your opinion

11   that the term "the system resources" doesn't mean a

12   different thing depending on specific context. Is

13   that correct?

14   MR. NGEREBARA: Objection, form.

15   A.   The system resources can be -- on you

16   assigned resources, the context at -- the context

17   and the needs of the application, for example, is an

18   example.

19   The needs of the application inside an

20   isolated environment will dictate potentially the

21   different -- the resources that you will be using.

22   To give you an example, if the

23   application requires more CPU, then you -- a set of

24   resources might be CPU.

25   If the application requires additional

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 1   memory and storage, then the set of resources might

 2   become memory and storage.

 3   It's not -- it's very well-defined that

 4   you might have different options for that mapping,

 5   of the additional resources. Not options of how you

 6   do the mapping, but basically what you will do.

 7   MR. MILKEY: We've been going about

 8   45 minutes. It's a little early, but I'm going to

 9   switch gears pretty soon to go on to your other

10   declaration.

11   So would it be okay if we took a

12   ten-minute break?

13   THE WITNESS: As far as I'm

14   concerned, no problem.

15   THE VIDEOGRAPHER: The time is

16   9:44 a.m., and we are going off the record.

17   (Recess taken at 9:44 a.m.,

18   resuming 9:55 a.m.)

19   THE VIDEOGRAPHER: The time is

20   9:55 a.m., and we are going on the record.

21   Q.   (By Mr. Milkey) Welcome back,

22   Dr. Stavrou.

23   Did you discuss the substance of your

24   deposition with counsel during the break?

25   A.   No.

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 1   Q.   If you could open up Exhibit 2, which is

 2   your declaration regarding the VirtaMove '058

 3   patent.

 4   A.   Just give me one second.

 5   I'm there.

 6   Q.   And if you could go to Page 13 of that

 7   declaration. This is the section that -- this is

 8   the start of the section that addresses the critical

 9   system elements limitation.

10   A.   (Reviewing.) Are you talking about

11   "'critical system elements'/'operating system

12   critical element -- system elements'/'shared library

13   critical system elements'"?

14   Q.   Correct.

15   If you go to the next page on

16   Paragraph 36, you have a discussion of Appendix C,

17   which is a publication titled "Robustness Testing of

18   the Microsoft Win32 API."

19   Do you see that?

20   A.   That is correct.

21   Q.   And the third sentence of Paragraph 36

22   states, "When researchers tested the robustness of

23   six Windows variants and the Linux operating system

24   using applications that use individual operating

25   system services one at a time through system calls,

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 1   they found that what constitutes a critical service

 2   depends on the operating system."

 3   Do you see that?

 4   A.   That is correct.

 5   Q.   Why does what constitutes a critical

 6   service depend on the operating system?

 7   MR. NGEREBARA: Objection, form.

 8   A.   So in this specific study the researchers

 9   created classes of what we call operating system

10   services, and they tried to quantify -- again, the

11   word "critical" here was quantifying reliability of

12   the service, in terms of failures, so there was a

13   very clear measure of what constitutes critical

14   service; and it's very well-defined in the paper

15   that is referred to in Appendix C.

16   So the four specific set of researchers,

17   what constitute the critical service depended

18   basically on the degrees of failures.

19   And I'm mentioning they have (as read):

20   "...degrees of failures from catastrophic (the

21   operating system seized to function) to even

22   nonsignificant, that (the application was able to

23   complete basically without loss of functionality."

24   Q.   (By Mr. Milkey) Okay. If a system

25   caused a catastrophic failure, does that mean that

 1   it's a critical system call?

 2   MR. NGEREBARA: Objection, form.

 3   MR. KASSA: Same objections.

 4   A.   In the sense that we need to understand

 5   if it's catastrophic failure, clearly it is creating

 6   a significant disruption.

 7   And for some people that would be

 8   critical, but there are also failures that can be

 9   considered critical because -- without necessarily

10   creating a catastrophic failure.

11   Because the term "critical," it's a term

12   of degree and actually this is exactly what this

13   paragraph is -- or the paper is trying to

14   illustrate, that there are two points here.

15   One point is that not all operating

16   systems depend even with the same classes

17   of services, generic class of services.

18   They have ways of dealing with failure

19   and they're not necessarily catastrophic. And at

20   the same time that there is the critical, it

21   requires quantification -- it's a term of degree.

22   Q.   (By Mr. Milkey) So but is a catastrophic

23   error necessarily a critical error?

24   MR. NGEREBARA: Objection, form.

25   MR. KASSA: Same objection.

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 1   A.   Actually that's exactly the point here,

 2   that for some operating system, the same -- the same

 3   function could cause catastrophic failure. But for

 4   some others, it did not.

 5   So a catastrophic here is -- is -- in

 6   terms of severity, it's the ultimate severity. But

 7   even if we take that ultimate catastrophic severity,

 8   it's not applied uniformly across the operating

 9   systems.

10   Q.   (By Mr. Milkey) Okay. Do you have the

11   PDF of Exhibit 2 open?

12   A.   Exhibit 2?

13   Q.   That's your declaration.

14   A.   Yes, I do.

15   Q.   Okay. Could you go to PDF Page 75? This

16   is in Appendix C.

17   A.   Just give me one second because I'm

18   scrolling.

19   Are you referring to the paper, the

20   Robustness Testing of the Microsoft Windows 32 API?

21   Q.   Yes.

22   A.   I'm there.

23   Q.   Okay. And so this is PDF Page 75, but on

24   Page 7 of that paper, of the Robustness Testing

25   paper, do you see at the top right of that Page 7 of

Page 35

```
 1    the Robustness Testing paper that there is a

 2    Listing 1?

 3         A.    Yes.

 4         Q.    Okay.  And it says that (as read):

 5    "Listing 1 is a line of code that produces

 6    catastrophic failures on Windows 95, Windows 98, and

 7    Windows CE."

 8              Correct?

 9         A.    Correct.

10         Q.    Okay.  So does that mean that, at least

11    for Windows 95, Windows 98, and Windows CE, that

12    this system call is a critical system call?

13                   MR. NGEREBARA:  Objection, form.

14                   MR. KASSA:  Same objection.

15         A.    No.  What Listing 1 says is that the

16    specific line of code produces catastrophic failures

17    for these three specific operating systems.

18    Catastrophic failures in the light of the operation

19    that is performed.

20         Q.    (By Mr. Milkey)  Okay.  And that would be

21    a critical failure?

22                   MR. NGEREBARA:  Objection, form.

23                   MR. KASSA:  Same objection.

24         A.    That would be a catastrophic failure,

25    according to what's recited in the paper.  And I
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 1    want to preface it, that not all -- first of all,

 2    not all of these catastrophic failures can be

 3    repeated.  Some of them are not repeatable.  And,

 4    also, they don't have the same, what we call,

 5    failure rates.

 6              So, for example, you might have a

 7    catastrophic failure, but it might be rare.  So that

 8    code here that you recited in Listing 1 -- and,

 9    again, I'm giving this as an example -- in other

10    operate- -- even other flavors of Windows operating

11    system might not have the same rate and effect of

12    catastrophic failure.

13              In other words, it might not have created

14    repeat -- it might not have caused repeatable

15    catastrophic system failures.  It's actually -- in

16    the next paragraph on this same paper, it says

17    Windows 95, Windows 98, and Windows 98 SE exhibited

18    similar...

19              Again, here is important.  The word

20    "similar" failure rates, including a number of

21    functions that cause repeatable catastrophic system

22    crash failures.

23       Q.    (By Mr. Milkey)  So in your declaration

24    you said that this paper relates to researchers

25    finding that what constitutes a critical service
```

 1 depends on the operating system.

 2   Where do -- where in Appendix C in this

 3 Robustness Testing paper do they describe anything

 4 as a critical service that depends on the operating

 5 system?

 6   MR. NGEREBARA: Objection, form.

 7   MR. KASSA: Same objection.

 8   A.   So in the literature, one way of

 9 quantifying -- let me back off.

10   In the literature there are many

11 different ways of quantifying what is critical and

12 the degree of criticality. However, in order to

13 define what is critical you need to have what we

14 call a context.

15   You need to understand basically the

16 different attributes that goes to the word

17 "critical."

18   In this specific example, the researchers

19 identified critical, and that's why criticality is

20 not basically mentioned. It mentioned catastrophic

21 failure. It doesn't mention critical failure. It's

22 based on the number of failures that you can have

23 and the degree of failure.

24   So you see here that there are two

25 dimensions:

 1   One dimension is, how many failures do we

 2   have?

 3   And the other dimension is, what is the

 4   severity? Or here, in this case, catastrophic

 5   versus noncatastrophic versus -- you know, there are

 6   different grades, if I want to call it, failure.

 7   And the reason that this is recited is

 8   because different operating systems, even utilizing

 9   same classes of services, exhibited different

10   degrees of dependence on those services.

11   In other words, what is critical for one

12   operating system -- no, what is catastrophic, not

13   critical, I apologize.

14   What is catastrophic or reliability-wise

15   critical, which is just one parameter that you can

16   quantify criticality, is completely different for

17   Windows 95, Windows 98, and Windows -- you know, and

18   Windows CE, for example -- as an example.

19   And this paper goes into much more detail

20   explaining that.

21   Q.   Okay. What is an example of a critical

22   service for any operating system in Appendix C?

23   MR. NGEREBARA: Objection, form.

24   MR. KASSA: Same objection.

25   A.   Again, the paper does not talk about

 1   criticality here. The paper talks about one element

 2   of what can constitute a degree of critical.

 3   And I want to emphasize the word "degree"

 4   here because it talks about failures. And one way

 5   of researchers in reliability theory, one way

 6   of -- and by the way, that's not the only way.

 7   To quantify the importance of a failure

 8   and to identify catastrophic versus noncatastrophic

 9   failures in lieu of using -- I would say, again --

10   and, again, I'm putting it with quotes like

11   translating, critical to reliability, degree of

12   liability of the system.

13   You have to take into consideration the

14   type of failure and how repeatable or rare is that

15   failure, including this -- up to this date, when we

16   have a failure in a system, it might be

17   catastrophic, but how probable it is to happen is

18   important.

19   So the criticality in this specific

20   context -- and I'm counting it as a context -- is

21   important if we took -- take the, you know,

22   liability part, which is not what the paper does.

23   But if we wanted to be able to translate

24   the paper language in the path of reliability, even

25   then it's very ambiguous.

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 1        Q.     (By Mr. Milkey)  Okay.  That's helpful.

 2              Okay.  And then if we could go to Page 20

 3    of your declaration, Exhibit 2.

 4        A.     I apologize.  Just give me one second and

 5    I will shift.

 6              I'm on Page 20.

 7        Q.     And this is regarding the functional --

 8    this is the start of the section where you address

 9    the "functional replicas" limitation.  Correct?

10        A.     Correct.

11        Q.     Okay.  And if we go to Paragraph 58 on

12    Page 22, you quote from the specification of the

13    '058 patent, which says, in part:  "The CSE library

14    includes replicas or substantial functional

15    equivalence or replacements of kernel functions."

16              Do you see that?

17        A.     I do.

18        Q.     In your opinion, would a person of skill

19    in the art be able to determine whether two

20    different kernel functions perform substantially the

21    same function?

22                   MR. NGEREBARA:  Objection, form.

23                   MR. KASSA:  Same objection.

24        A.     In my opinion, a POSITA would not be able

25    to quantify, in this specific case, what
```

 1   substantial -- the word "substantial" means.

 2   Also, the word "equivalent" is, again,

 3   ambiguous. In software engineering, we have

 4   different means of identifying software

 5   functionality attributes that identify equivalence.

 6   So equivalence has to be quantified.

 7   Is it equivalent because they have the

 8   same -- they have the same APIs?

 9   Do they turn the same -- do they get the

10   same inputs and outputs?

11   There are a lot of different attributes

12   that I could sit down and list here that define what

13   two software -- sorry -- two -- in this case you

14   mentioned kernel functions and I will stick with

15   that. Two kernel functions, how they can be

16   compared.

17   So that's not defined anywhere here. So

18   to me, it's not clear.

19   Q.   (By Mr. Milkey) And going back up a page

20   to Page 21. And this is Paragraph 55 I want to ask

21   you about.

22   The second sentence of Paragraph 55

23   states: "That a CSE is 'replicated' by being

24   'repeated' would suggest to a POSITA that the CSE is

25   an 'exact copy of a CSE in the operating system.'"

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```
 1                Do you see that?

 2      A.    I do.

 3      Q.    Okay.  So I'm trying to understand what

 4   you mean by that.

 5                In particular, if one kernel function is

 6   an exact copy of another kernel function, would both

 7   kernel functions be replicas of one another?

 8                MR. NGEREBARA:  Objection, form.

 9                MR. KASSA:  Same objection.

10      A.    Again, if they are exact, identical

11   copies -- I'm talking every form, in terms of

12   software -- and they also reside in the kernel

13   space, they're not being moved from one space to

14   another, basically if they are copied next to each

15   other and they are next to each other, then the word

16   "replica" here would mean a copy.  And I would

17   agree.

18                MR. MILKEY:  Okay.  I have no further

19   questions.

20         (Following commenced at 10:14 a.m.)

21                MR. NGEREBARA:  How about we take a

22   two-minute break?  I doubt we will have any

23   questions, but let me consult with my colleagues and

24   we will be back.

25                MR. MILKEY:  Okay.
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 1                    THE VIDEOGRAPHER:  The time is
 2   10:14 a.m., and we are going off the record.
 3                    (Recess taken at 10:14 a.m.,
 4                    resuming at 10:18 a.m.)
 5                    THE VIDEOGRAPHER:  The time is
 6   10:18 a.m., and we are going on the record.
 7                    MR. NGEREBARA:  We have no questions.
 8   No further questions at this point.
 9                    MR. KASSA:  And HPE also has no
10   further questions at this point.
11                    MR. MILKEY:  All right.  Let's go off
12   the record.
13                    THE VIDEOGRAPHER:  The time is
14   10:19 a.m., and we are going off the record.
15              (Deposition concluded at 10:19 a.m.)
16                         * * *
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 1                     VIRTAMOVE, CORP. Vs.
               HEWLETT PACKARD ENTERPRISE COMPANY
 2
                VIDEOTAPED / REALTIMED DEPOSITION OF
 3                      DR. ANGELOS STAVROU
                        FEBRUARY 7, 2025
 4
                      CHANGES AND SIGNATURE
 5
        PAGE        LINE          CHANGE              REASON
 6      ____        ____    _____    _____

 7      ____        ____    _____    _____

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 9      ____        ____    _____    _____

10      ____        ____    _____    _____

11      ____        ____    _____    _____

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 1   ____   ____   _____   _____

 2   ____   ____   _____   _____

 3   ____   ____   _____   _____

 4   ____   ____   _____   _____
```

 5   I, DR. ANGELOS STAVROU, have read the

 6   foregoing deposition and hereby affix my signature

 7   that same is true and correct, except as noted

 8   above.

 9

10   _____

11   DR. ANGELOS STAVROU

12

13   THE STATE OF_____:

14   COUNTY OF_____:

15

16   BEFORE ME, _____, on this day
     appeared DR. ANGELOS STAVROU, known to me or proved
     to me on the oath of _____ or through

17   _____ [description of identity card or
     other document] to be the person whose name is

18   subscribed to the foregoing instrument and
     acknowledged to me that they executed the same for

19   purposes and consideration therein expressed.

20   Given under my hand on this _____ day
     of _____, 2025.

21

22

         Notary Public in and for the
23   State of _____
         My commission expires: _____

24

25   Job No.: 10232

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 1
                 IN THE UNITED STATES DISTRICT COURT
 2   FOR THE EASTERN DISTRICT OF TEXAS
                          MARSHALL DIVISION
 3
                   CASE NO. 2:24-CV-00093-JRG-RSP
 4   _____

 5   VIRTAMOVE, CORP.,

 6   Plaintiff,

 7   vs.

 8   HEWLETT PACKARD ENTERPRISE COMPANY,

 9   Defendant.

10   _____

11   CASE NO. 2:24-CV-00064-JRG-RSP

12   VirtaMove, CORP.,

13   Plaintiff,

14   vs.

15   INTERNATIONAL BUSINESS MACHINES CORP.,

16   Defendant.
      _____
17   REPORTER'S CERTIFICATION
                VIDEOTAPED / REALTIMED DEPOSITION OF
18   DR. ANGELOS STAVROU
                         FEBRUARY 7, 2025
19

20   I, Pat English-Arredondo, CSR, RMR, CRR, CLR,

21   Certified Shorthand Reporter in and for the State of

22   Texas, hereby certify to the following:

23   That the witness, DR. ANGELOS STAVROU, was duly

24   sworn by the officer and that the transcript of the

25   oral deposition is a true record of the testimony

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 1   given by the witness;

 2      I further certify that pursuant to FRCP Rule

 3   30(f)(1) that the signature of the deponent:

 4      __X___ was requested by the deponent or a party

 5   before the completion of the deposition and returned

 6   within 30 days from date of receipt of the

 7   transcript.  If returned, the attached Changes and

 8   Signature Page contains any changes and the reasons

 9   therefor;

10      _____ was not requested by the deponent or a party

11   before the completion of the deposition.

12      I further certify that I am neither counsel for,

13   related to, nor employed by any of the parties or

14   attorneys in the action in which this proceeding was

15   taken, and further that I am not financially or

16   otherwise interested in the outcome of the action.

17      Certified to by me this 11th day of February,

18   2025.

19                    _____
                      Pat English-Arredondo,
20                    CSR (TX), RMR, CRR, CLR
                      Texas CSR 3828
21                    Expiration Date:  4/30/2026

22   TransPerfect Legal Solutions
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24   Depo@TransPerfect.com

25   Job No. 10232
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